

# **EXHIBIT 4**

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**From:** Houghton-Larsen, M Annie  
**Sent:** Sunday, December 29, 2024 11:39 AM  
**To:** Joseph Cammarata, Esq.; Nathan, Aaron E.  
**Cc:** Gottlieb, Michael; Governski, Meryl Conant  
**Subject:** RE: Depositions

Joe,

Thank you for your email.

Regarding Mr. Medrano, we will not agree to cancel his deposition. Not only was Mr. Medrano properly served and noticed for his deposition, but Mr. Giuliani repeatedly declined to or was unable to answer questions in his deposition and testified that the answers would be known by Mr. Medrano. We will expect Mr. Medrano at Willkie's New York office at 9 a.m. on December 31, 2024 as noticed.

Regarding Mr. Goodman and Dr. Ryan, neither witness has complied with the Court's orders to fully respond to Plaintiffs' subpoenas for documents. Mr. Goodman has not produced any documents and Dr. Ryan has only produced a single document. As we have said repeatedly in emails over the last week, Plaintiffs will make the Court aware of this non-compliance on December 31, 2024.

Additionally, both depositions were properly served and noticed for in person depositions, and neither Mr. Goodman nor Dr. Ryan ever indicated that they would be unable to appear in person. We have the right to conduct depositions in person and intend to do so. Your email today, the day before the depositions, is the first indication we have that the witnesses would like to appear remotely. We expect Dr. Ryan at Willkie's New York office at 9 a.m. on December 30, 2024 as noticed and Mr. Goodman at Willkie's New York office at 1:00 p.m. as noticed. Should you like to join by zoom, we will provide you with a link tomorrow prior to the depositions beginning.

Thank you,

**M. Annie Houghton-Larsen**  
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Pronouns: she, her, hers

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**From:** Joseph Cammarata, Esq. <Joe@CammarataLawPC.com>  
**Sent:** Sunday, December 29, 2024 11:24 AM  
**To:** Nathan, Aaron E. <ANathan@willkie.com>  
**Cc:** Gottlieb, Michael <MGottlieb@willkie.com>; Governski, Meryl Conant <MGovernski@willkie.com>; Houghton-Larsen, M Annie <MHoughton-Larsen@willkie.com>  
**Subject:** Depositions

\*\*\* EXTERNAL EMAIL \*\*\*

Good afternoon all,

Please be advised I will not be calling Michael Ragusa or Ryan Medrano at trial, therefore their depositions are unnecessary. Please send me, Dr. Ryan and Theodore Goodman, the links for the virtual depositions tomorrow. Thank you and be well.-Joe

Regards,

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